



STATE OF CONNECTICUT

OFFICE OF STATE ETHICS

January 28, 2019

VIA ELECTRONIC MAIL: (Colleen.Flanagan@ct.gov)

Colleen Flanagan Johnson
Senior Advisor
Office of the Governor
Hartford, CT 06106

Dear Ms. Flanagan Johnson:

This letter is in response to your request for informal advice, dated January 23, 2019, in which you ask whether the proposed courses of action concerning your husband's lobbyist clients comply with the Code of Ethics for Public Officials ("Ethics Code"). Specifically, you noted the following:

In order to avoid even the appearance of a conflict of interest on my part, and out of an abundance of caution, I have decided on three courses of action:

- First, I will not take meetings with any of the clients for which my husband is the primary lobbyist.
- Second, I will provide the Governor's Chief of Staff and General Counsel with a list of all clients for which my husband is the primary lobbyist. I will update that list as it changes. The Chief of Staff and I will decide on a case-by-case basis whether I should recuse myself from a particular matter in order to avoid even the appearance of a potential conflict of interest.
- Third, my husband and I have agreed not to discuss with each other the clients and issues on which he lobbies the Executive Branch.

Based on the facts presented, the proposed courses of action, not just comply with the requirements of the Ethics Code, but go beyond those requirements.

As you may know, under the Ethics Code, particularly General Statutes §§ 1-84 (c), 1-85 and 1-86, a public official is prohibited from taking official action or otherwise using his or her state office to influence any state action, for the financial benefit of (among others) himself or herself, his or her family members, or any "business with which he is associated." Therefore, in the event your husband becomes a partner of the lobbying firm and, as such, the firm becomes a business with which you are associated, you will have to abstain from official action involving the firm and any of its clients if there is a reasonable likelihood that either the firm or your husband would derive financial benefit from your actions.

Please do not hesitate to contact me should you have any additional questions or require further guidance.

Sincerely,



Peter J. Lewandowski
Associate General Counsel